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**A2003004**

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE  
STATE OF CALIFORNIA**

Application of Southern California Edison  
Company (U 338-E) for Approval of its 2020  
Energy Storage Procurement and Investment Plan.

Application No. 20-03-\_\_\_\_

**APPLICATION OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E)  
FOR APPROVAL OF ITS 2020 ENERGY STORAGE PROCUREMENT AND  
INVESTMENT PLAN**

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Dated: **March 2, 2020**

**APPLICATION OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) FOR  
APPROVAL OF ITS 2020 ENERGY STORAGE PROCUREMENT AND INVESTMENT PLAN  
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**I.**

**INTRODUCTION**

Pursuant to Rules 1 and 2 of the California Public Utilities Commission’s (CPUC or Commission) Rules of Practice and Procedure, Sections 451, 454, 701, 728, 729, 2838.2, and 2838.3 of the Public Utilities Code, Decision (D.) 13-10-040 Adopting Energy Storage Procurement Framework and Design Program (Storage Decision), D.16-01-032 On Track 1 Issues (Track 1 Decision), and D. 17-04-039 On Track 2 Energy Storage Issues (Track 2 Decision), Southern California Edison Company (SCE) submits this Application for Approval of its 2020 Energy Storage Procurement and Investment Plan (Application). Concurrently with the filing of this Application, SCE is serving one volume of testimony in support of this Application, including related appendices.

## II.

### BACKGROUND

On December 16, 2010, the Commission opened Rulemaking (R.) 10-12-007 to implement the provisions of Assembly Bill (AB) 2514 (Stats. 2010, ch. 469).<sup>1</sup> AB 2514 required the Commission to determine appropriate targets, if any, for each load-serving entity (LSE) as defined by Section 380(j) of the Public Utilities Code to procure viable and cost-effective energy storage systems, and to do so by October 2013.

The proceeding was divided into two phases. Phase 1 concluded with the issuance of D.12-08-016, which adopted the Energy Storage Framework Staff Proposal and provided an analysis framework and a plan for developing policies and guidelines, as well as an energy storage “end use” framework.<sup>2</sup> Phase 2 was designed to consider issues including cost-effectiveness, market needs, barriers, ownership models, and procurement targets, if any. Energy Division staff conducted workshops and developed use-case documents to illustrate how energy storage could be deployed.

On June 10, 2013, Commissioner Carla Peterman issued an Assigned Commissioner’s Ruling (ACR) with a straw proposal for procurement targets for LSEs to procure energy storage, and solicited comments from stakeholders on the overall storage procurement framework, program design, program implementation, program evaluation, and coordination with other proceedings.<sup>3</sup> On October 21, 2013, the Commission issued the Storage Decision, which adopted, with modifications, much of the ACR’s straw proposal for procurement targets.<sup>4</sup> The Storage Decision also requires the investor-owned utilities (IOUs) to file biennial procurement plans through 2020 containing proposals for energy storage procurement, with specific requirements, explanations,

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<sup>1</sup> Pub. Util. Code Section 2836 *et seq.*

<sup>2</sup> See D.12-08-016, Decision Adopting Proposed Framework for Analyzing Energy Storage Needs, Aug. 2, 2012.

<sup>3</sup> See Assigned Commissioner's Ruling Proposing Storage Procurement Target and Mechanisms and Noticing All Party Meeting, Jun. 10, 2013.

<sup>4</sup> D.13-10-040, at 9.

descriptions, and methodologies.<sup>5</sup> In accordance with the Energy Storage decision, SCE filed an application requesting the Commission approve SCE's Energy Storage Procurement Plan for the 2014-2016 procurement period.<sup>6</sup> The Commission reviewed and ultimately approved SCE's plan.<sup>7</sup>

On March 26, 2015 the Commission opened a successor rulemaking, R.15-03-011, to consider policy and implementation refinements to the Energy Storage Procurement Framework adopted in the Storage Decision. The rulemaking proceeding was divided into two tracks. Track 1 considered issues that had to be resolved before the IOUs submitted their 2016 energy storage procurement solicitations. Track 2 was designed to consider other issues related to the continued implementation of the Energy Storage Program.

On January 28, 2016 the Commission issued the Track 1 Decision<sup>8</sup> which, among other things, maintained the IOUs' flexibility to design their request for offer (RFO) process, allowed greater flexibility of energy storage targets among grid domains, and extended the authorization of the Power Charge Indifference Adjustment (PCIA) mechanism for "bundled" energy storage services procured via the 2016 solicitation. On September 26, 2016, the Governor signed AB 2868 into law, encouraging the three IOUs to propose programs and investments to procure additional distributed energy storage.<sup>9</sup>

On May 8, 2017, the Commission issued the first Track 2 Decision which addressed, among other things, energy storage procurement targets, the rules regarding the treatment of station power for energy storage devices, and implementation of AB 2868. In the Commission's Track 2 Decision, the IOUs were directed to comply with AB 2868 by incorporating proposals for distributed energy storage programs, systems, and investments into the existing biennial

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<sup>5</sup> D.13-10-040, Appendix A, Energy Storage Procurement Framework and Design Program, at 7-10.

<sup>6</sup> A.14-02-009, Application of Southern California Edison for Approval of its 2014 Energy Storage Procurement Plan, February 28, 2014.

<sup>7</sup> D.14-10-045, Decision Approving San Diego Gas & Electric Company, Pacific Gas and Electric Company, and Southern California Edison Company's Storage Procurement Framework and Program Applications for the 2014 Biennial Procurement Period, October 16, 2014.

<sup>8</sup> D.16-01-032.

<sup>9</sup> Cal. Pub. Util. Code § 2838.2 - § 2838.3.

procurement application process.<sup>10</sup> D.17-04-039 also directed the IOUs to participate in a number of workshops to receive stakeholder input on their proposed AB 2868 programs and investments.

In October 2017 the Governor approved Senate Bill (SB) 801, which orders the Commission to direct SCE, before June 1, 2018, to deploy cost-effective energy storage to address system reliability issues created by the partial shutdown of the Aliso Canyon Natural Gas Storage Facility.<sup>11</sup>

On January 11, 2018, the Commission addressed the last of the Track 2 issues in D.18-01-003. The Commission worked closely with the California Independent System Operator (CAISO) and others to develop a framework for multiple-use energy storage applications.<sup>12</sup> This decision adopted a set of rules to guide stacking and compensation for multiple use energy storage that must be adopted by all IOUs in their procurement process.

SCE files this Application and its biennial procurement and investment plan in accordance with Ordering Paragraph 3 of the Storage Decision and the Energy Storage Procurement Framework as modified by the Track 1 and Track 2 Decisions. As explained in the Application and throughout SCE's Testimony, SCE's proposed 2020 Energy Storage Procurement and Investment Plan is reasonable and consistent with the policy objectives and goals of the Storage Decision, as well as the further refinements to the Energy Storage Procurement Framework.

### III.

#### **SUMMARY OF REQUEST**

##### **A. Overview**

SCE requests Commission approval of its 2020 Energy Storage Procurement and Investment Plan, which outlines SCE's proposed energy storage procurement and investment activities for the

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<sup>10</sup> D.17-04-039, Decision on Track 2 Energy Storage Issues, May 8, 2017, at 19-22.

<sup>11</sup> Pub. Util. Code § 2836.7(b).

<sup>12</sup> D.18-01-003 at 7-8.

2020 energy storage procurement cycle. Specifically, SCE seeks approval of its plan pursuant to AB 2514 and its proposed programs pursuant to AB 2868.

**B. Proposed 2020 Energy Storage Procurement and Investment Plan**

As detailed in SCE’s accompanying testimony, SCE’s Energy Storage Procurement and Investment Plan can be divided into four general components: (1) SCE’s progress towards its energy storage targets and its procurement to meet the 2020 target; (2) SCE’s two proposed AB 2868 programs and investments, including proposed cost recovery; (3) SCE’s additional storage activities; and (4) safety of the energy storage facilities under contract with SCE as well as those owned by SCE.

**1. SCE Has Exceeded Its AB 2514 Procurement Target of 580 MW and Will Not Issue a Stand-Alone Solicitation**

Pursuant to the Storage Decision,<sup>13</sup> SCE’s target for the 2020 procurement cycle is 210 MW across the three grid domains, and its cumulative target (accounting for the 2014, 2016, and 2018 procurement cycles) is 580 MW across the three grid domains. After applying the counting rules established in D.13-10-040 as modified by D.16-01-032, SCE’s total eligible procurement through the 2020 procurement cycle is 609.08 MW, which is 29.08 MW above the 580 MW cumulative target. Because SCE has already exceeded the 580 MW procurement target set by the Storage Decision pursuant to AB 2514, SCE does not plan to submit a stand-alone solicitation in this Application. Nonetheless, SCE plans to continue its ongoing efforts to pursue reasonable and cost-effective energy storage solutions that will facilitate system reliability, provide the grid with additional operational flexibility, and achieve the guiding principles of AB 2514. During this current 2020 procurement cycle, storage will be an eligible resource in SCE’s System Reliability RFO, reliability utility owned energy storage (RUOES) RFP, Distribution Investment Deferral

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<sup>13</sup> D.13-10-040, Appendix A, p. 2.

Framework (DIDF) RFO, Distribution Energy Storage Integration (DESI) pilots, and potentially as part of procurement that may be ordered in the Microgrid OIR.

**2. SCE Seeks Approval of Two Programs and Investments Pursuant to AB 2868**

AB 2868 requires that PG&E, SCE, and SDG&E propose programs and investments for up to 500 MW of distributed energy storage systems, distributed equally among the three utilities, above and beyond the 1,325 MW target for energy storage generally. In D.17-04-039, the Commission directed the utilities to incorporate these program and investments, for up to 166.66 MW each, in their 2018 energy storage procurement and investment plans. Consistent with Public Utilities (P.U.) Code Section 2838.2, the proposed programs and investments should demonstrate customer benefits, seek to minimize overall costs and maximize overall benefits, reduce dependence on petroleum, meet air quality standards, and reduce greenhouse gas emissions while not unreasonably limiting or impairing the ability of non-utility enterprises to market and deploy energy storage systems. AB 2868 further provides that the Commission prioritize approval of those programs and investments that provide energy storage systems to public sector and low-income customers.

In accordance with the statute and having considered input from stakeholders, SCE proposes two behind-the-meter (BTM) programs: (1) the New Home Energy Storage Pilot (NHESP) to incentivize storage adoption in new construction housing subject to Title 24 photovoltaic (PV) code requirements; and (2) the Smart Heat Pump Water Heater Program, a thermal storage program similar to Pacific Gas and Electric’s (PG&E) “WatterSaver Program” adopted by the Commission in D.19-06-032. SCE is requesting approval of a \$5 and \$15 million budget respectively to implement its two programs. These investments and programs, including SCE’s proposal for cost recovery, comply with the statutory criteria summarized above and should be approved by the Commission.

### **3. SCE Continues to Pursue Additional Energy Storage Use Cases as a Path to a Clean Energy Economy**

In addition to SCE's proposed procurement and AB 2868 programs and investments, SCE's testimony also describes SCE's additional activities to promote energy storage.<sup>14</sup> For example, SCE has issued an RFP in the Microgrids OIR and noted its preference for clean resources, which includes energy storage. While it is currently unclear whether energy storage will be both cost-effective and feasible to deploy as a microgrid generating resource in 2020, SCE envisions energy storage playing a large role in microgrids in the future, especially as technology improves and costs continue to fall.

SCE continues to examine the role that energy storage can play to facilitate the state's achievement of a clean energy future.<sup>15</sup> Given the state's low carbon goals, the planning process for large-scale energy storage investments should start now. SCE will continue to evaluate how, and in what way, energy storage can contribute to the state's low carbon future. If SCE determines that additional use cases, projects, or proposals can benefit customers and the State's energy policy goals, SCE will present those ideas to the Commission and stakeholders through an appropriate public filing.

### **4. SCE's Approach to Safety of Energy Storage Resources**

SCE's approach to the safety of energy storage resources is detailed in Chapter VII of SCE's supporting testimony.<sup>16</sup> With respect to utility procurement of energy storage resources, responsibility of safe operations falls on the owner/operator of the facility. However, SCE includes

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<sup>14</sup> SCE shares these activities for the Commission's awareness; no particular approval or action by the Commission is needed for these activities at this time.

<sup>15</sup> For additional information on SCE's vision for how the state can achieve its environmental goals to reduce the threat of climate change and improve public health related to air quality, please see SCE's recently released whitepaper titled, "Pathway 2045 Update to the Clean Power and Electrification Pathway" (November 2019) available at <https://www.edison.com/content/dam/eix/documents/our-perspective/201911-pathway-to-2045-white-paper.pdf>.

<sup>16</sup> Rule 2.1(c) of the Commission's Rules of Practice and Procedure requires SCE to include a discussion of relevant safety considerations in SCE's application.

provisions in its contracts to require third-party sellers to engage in safe practices and comply with all applicable laws, permit requirements, and applicable California utility industry standards. Additionally, safety standards and certifications are incorporated into applicable interconnection tariffs, which allow SCE to review energy storage equipment prior to installation, and during pre- and post- commercial testing.

SCE has also participated in a Commission-sponsored energy storage safety working group to develop a Commission energy storage safety inspection protocol for the Commission's Safety and Enforcement Division inspectors to use based on expertise from the utilities, codes and standards development organizations, energy storage developers, and other interested parties. SCE will continue to participate in the energy storage safety working group to refine the energy storage safety protocol as technology develops and matures as needed.<sup>17</sup>

#### IV.

#### **ORGANIZATION OF SCE'S TESTIMONY**

Exhibit SCE-01, "Testimony of Southern California Edison Company in Support of Its 2020 Energy Storage Procurement and Investment Plan," is organized in a single volume with seven chapters as follows:

- Chapter I provides an overview of SCE's energy storage procurement and investment plan, as well as background on relevant Commission decisions and legislative bills;
- Chapter II provides SCE's overall energy storage procurement framework and discusses how SCE has met the Commission's energy storage procurement requirement;

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<sup>17</sup> For additional details regarding the Commission's energy storage safety checklist, please see the link provided below:  
[http://www.cpuc.ca.gov/uploadedFiles/CPUC\\_Public\\_Website/Content/Safety/Risk\\_Assessment/ESS%20Inspection%20Guidelines.doc](http://www.cpuc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/Safety/Risk_Assessment/ESS%20Inspection%20Guidelines.doc).

- Chapter III provides SCE’s existing and planned energy storage projects that SCE believes are eligible to count towards SCE’s 2020 energy storage procurement target and their mechanisms, including SCE’s System Reliability RFO, RUOES RFP, DIDF RFO, and DESI pilots.
- Chapter IV provides SCE’s proposed energy storage programs and investments pursuant to AB 2868;
- Chapter V provides SCE’s other energy storage activities that further the Commission’s policies promoting energy storage; and
- Chapter VI provides SCE’s commitment and approach to safety issues arising out of energy storage procurement.

SCE also attaches the following appendices to its testimony:

- Appendix A SCE’s AB 2514 Eligible Energy Storage Resources
- Appendix B Witness Qualifications

SCE seeks timely approval of SCE’s Application so that it can proceed with its planned energy storage programs and investments pursuant to AB 2868.

## V.

### **STATUTORY AND PROCEDURAL REQUIREMENTS**

#### **A. Statutory and Other Authority**

SCE files this Application pursuant to the California Public Utilities Code, specifically sections 451, 454, 701, 702, 728, 729, 739, 2838.2 and 2838.3, the Commission’s Rules of Practice and Procedure, and other prior orders and resolutions of the Commission.

SCE’s request complies with Rules 1.5 through 1.11 and 1.13 of the Commission’s rules which specify the procedures for, among other things, filing documents. In addition, the Application complies with Rules 2.1 and 2.2.

Rule 2.1 requires that all applications: (1) clearly and concisely state authority or relief sought; (2) cite the statutory or other authority under which that relief is sought; and (3) be verified

by the applicant. SCE's Application sets forth the relief sought, the authority for such relief, and has been verified by an SCE officer as provided in Rules 1.11 and 2.1. Article 2 sets forth further requirements that are addressed separately below.

In particular, as detailed above, D.13-10-040 requires SCE to file a biennial Application with the Commission containing its proposal for procuring energy storage resources by March 1, 2020.<sup>18</sup> As required by the Storage Decision, SCE developed a list of applicable rules and statutes impacting energy storage procurement; SCE is attaching that list as Appendix A.

**B. Legal Name and Correspondence – Rules 2.1(a) and 2.1(b)**

The legal name of the Applicant is Southern California Edison Company. SCE is a corporation organized and existing under the laws of the State of California, and is primarily engaged in the business of generating, purchasing, transmitting, distributing and selling electric energy for light, heat and power in portions of central and southern California as a public utility subject to the jurisdiction of the California Public Utilities Commission. SCE's properties, which are located primarily within the State of California, consist mainly of hydroelectric and thermal electric generating plants, together with transmission and distribution lines and other property necessary in connection with its business.

SCE's principal place of business is 2244 Walnut Grove Avenue, Rosemead, California, and its post office address and telephone number are:

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<sup>18</sup> Because March 1, 2020 falls on a Sunday, SCE files its Application the next day on March 2, 2020.

Southern California Edison Company  
Post Office Box 800  
Rosemead, California 91770  
Telephone: (626) 302-1212

SCE’s attorney in this matter is Paul I. Sung. Correspondence or communications regarding this Application should be addressed to:

Paul I. Sung Southern California Edison Company P.O. Box 800 2244 Walnut Grove Avenue Rosemead, California 91770 Telephone: (626) 302-2985 E-mail: paul.sung@sce.com	SCE Case Administration Southern California Edison Company 8631 Rush Street Rosemead, California 91880 Telephone: (626) 302-6906 E-mail: Case.Admin@sce.com
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**C. Categorization, Hearings, and Issues to be Considered – Rule 2.1(c)**

**1. Proposed Category**

SCE proposes that this proceeding be categorized as a “ratesetting” proceeding as defined in Rule 1.3(f) of the Commission’s Rules of Practice and Procedure and California Public Utilities Code § 1701.1(c)(3). SCE is proposing a rate increase associated with its incentive program for energy storage for multifamily dwellings. SCE also proposes its plan for cost recovery of its AB 2868 programs and investments.

**2. Need for Hearings**

SCE’s Application and the supporting Testimony and Exhibits constitute a sufficient record for the Commission to rule on SCE’s Application without the need for evidentiary hearings. All interested parties can comment and express their views in writing through written protests, testimony, and comments. Nevertheless, SCE’s proposed procedural schedule includes time allotted for evidentiary hearings should they be required.

### 3. Proposed Schedule

SCE proposes the following schedule, which meets AB 2868’s mandate that the Commission address the IOU’s applications for programs and investments of energy storage within twelve (12) months.<sup>19</sup>

SCE Files Application	March 2, 2020
Daily Calendar Notice Appears	March 9, 2020
Protests/Responses to Application	April 8, 2020
Reply to Protests/Responses	April 17, 2020
Prehearing Conference	May 4, 2020
Intervenor Testimony Due	June 12, 2020
Rebuttal or Reply Testimony Due	July 14, 2020
Evidentiary Hearings (if necessary)	August 10-11, 2020
Concurrent Opening Briefs	September 15, 2020
Reply Briefs	October 15, 2020
Commission Issues Proposed Decision	January 7, 2021
Comments to Proposed Decision	January 27, 2021
Replies to Comments to Proposed Decision	February 1, 2021
Commission Issues Final Decision	March 1, 2021

### 4. Issues to Be Considered

The issues to be considered in connection with this Application are specified in SCE’s Testimony, the Summary of SCE’s Request in Section III above, and the Prayer for Relief set forth in Section VI below. More specifically, the Commission must determine if SCE’s plan is reasonable, and if SCE’s proposed AB 2868 programs and investments meet the statutory requirements for such programs and investments. This Application does not involve safety issues,

<sup>19</sup> Cal. Pub. Util. Code §2832.2(d)(1).

but SCE's approach to the safety of energy storage resources is discussed in SCE's testimony and above in the summary of SCE's Application.

**D. Organization, Qualification to Transact Business and Articles of Incorporation – Rule 2.2**

A copy of SCE's Certificate of Restated Articles of Incorporation, effective on March 2, 2006, and presently in effect, certified by the California Secretary of State, was filed with the Commission on March 14, 2006, in connection with Application No. 06-03-020, and is incorporated herein by this reference pursuant to Rule 2.2 of the Commission's Rules of Practice and Procedure.

A copy of SCE's Certificate of Determination of Preferences of the Series D Preference Stock filed with the California Secretary of State on March 7, 2011, and presently in effect, certified by the California Secretary of State, was filed with the Commission on April 1, 2011, in connection with Application No. 11-04-001, and is incorporated herein by this reference.

A copy of SCE's Certificate of Determination of Preferences of the Series E Preference Stock filed with the California Secretary of State on January 12, 2012, and a copy of SCE's Certificate of Increase of Authorized Shares of the Series E Preference Stock filed with the California Secretary of State on January 31, 2012, both presently in effect, certified by the California Secretary of State, were filed with the Commission on March 5, 2012, in connection with Application No. 12-03-004, and are incorporated herein by this reference.

A copy of SCE's Certificate of Determination of Preferences of the Series F Preference Stock filed with the California Secretary of State on May 5, 2012, and presently in effect, certified by the California Secretary of State, was filed with the Commission on June 29, 2012, in connection with Application No. 12-06-017, and is incorporated herein by this reference.

A copy of SCE's Certificate of Determination of Preferences of the Series G Preference Stock filed with the California Secretary of State on January 24, 2013, and presently in effect, certified by the California Secretary of State, was filed with the Commission on January 31, 2013, in connection with Application No. 13-01-016, and is incorporated herein by this reference.

A copy of SCE's Certificate of Determination of Preferences of the Series H Preference Stock filed with the California Secretary of State on February 28, 2014, and presently in effect, certified by the California Secretary of State, was filed with the Commission on March 24, 2014, in connection with Application No. 14-03-013, and is incorporated herein by this reference.

A copy of SCE's Certificate of Determination of Preferences of the Series J Preference Stock filed with the California Secretary of State on August 19, 2015, and presently in effect, certified by the California Secretary of State, was filed with the Commission on October 2, 2015, in connection with Application No. 15-10-001, and is incorporated herein by this reference.

A copy of SCE's Certificate of Determination of Preferences of the Series K Preference Stock filed with the California Secretary of State on March 2, 2016, and presently in effect, certified by the California Secretary of State, was filed with the Commission on April 1, 2016, in connection with Application No. 16-04-001, and is incorporated herein by this reference.

A copy of SCE's Certificate of Determination of Preferences of the Series L Preference Stock filed with the California Secretary of State on June 20, 2017, and presently in effect, certified by the California Secretary of State, was filed with the Commission on June 30, 2017, in connection with Application No. 17-06-030, and is incorporated herein by this reference.

Certain classes and series of SCE's capital stock are listed on a "national securities exchange" as defined in the Securities Exchange Act of 1934 and copies of SCE's latest Annual Report to Shareholders and its latest proxy statement sent to its stockholders has been filed with the Commission with a letter of transmittal dated March 18, 2019, pursuant to General Order Nos. 65-A and 104-A of the Commission.

**E. Balance Sheet and Income Statement – Rule 3.2(a)(1)**

Appendix B to this Application contains copies of SCE's balance sheet as of September 30, 2019, and income statement for the period ending September 30, 2019, the most recent period available.

**F. Statement of Presently Effective and Proposed Rates – Rules 3.2(a)(2) and 3.2(a)(3)**

The presently effective rates and the changes proposed to be made thereto are provided below. The proposed rates are illustrative and will be updated consistent with the Commission’s decision in this proceeding to reflect SCE’s then-current authorized revenues when such rates are implemented. SCE’s proposed ratemaking is discussed in Chapter V of SCE’s testimony (Exhibit SCE-01).

**G. Summary of Earnings – Rule 3.2(a)(5)**

SCE’s 2017-2020 GRC Authorized Summary of Earnings is attached hereto as Appendix C.

**H. Statement Pursuant to Rule 3.2(a)(10)**

SCE’s request in this Application reflects and passes through to customers \$20 million that has not been, and will not be, authorized in other Commission proceedings. This revenue requirement does, therefore, pass through to customers the “increased costs to the corporation for the services or commodities furnished by it.”

**I. Service of Notice – Rule 3.2(b), (c), and (d)**

As required by Rule 3.2(b)-3.2(d), a notice of filing this Application will be: (1) mailed to the designated officials of the state and the counties and cities listed in Appendix D hereto; (2) published in a newspaper of general circulation in each county in SCE’s service territory within which the rate changes would be effective; and (3) mailed or served electronically on all customers affected by the proposed rate changes.

**J. Appendices to This Application and Index of Exhibits**

SCE’s submissions in support of this Application include the following, which are incorporated herein by reference:

<b>Appendices to Application</b>	
Appendix A	List of Applicable Statutes and Rules That May Impact Energy Storage Procurement
Appendix B	SCE's Statement of Income and Balance Sheet
Appendix C	SCE's Summary of Earnings (2018-2020)
Appendix D	List of Cities and Counties in which the Proposed Increase is to be made Effective
<b>Exhibits to Application</b>	
Exhibit SCE-01	Testimony of Southern California Edison Company in Support of Its 2020 Energy Storage Procurement and Investment Plan

**K. Service List**

SCE has served a copy of this Application and its supporting testimony on all parties to R.15-03-011 and A.18-02-016, A.18-03-001, A.18-03-002 (consolidated). SCE has also served a copy of this Application and its supporting testimony and appendices on the Commission.

**VI.**

**PRAYER FOR RELIEF**

SCE respectfully requests that the Commission:

1. Approve the Application in its entirety;
2. Approve SCE's proposed 2020 Energy Storage Procurement and Investment Plan;
3. Approve SCE's proposed AB 2868 programs and investments, and authorize SCE to recover \$20 million of incremental costs in rates consistent with SCE's proposed cost recovery discussed in Chapter V of Exhibit SCE-01; and
4. Grant such other and further relief as the Commission finds just and reasonable.

Respectfully submitted,

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*/s/ Paul I. Sung*

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March 2, 2020

**VERIFICATION**

I am an officer of the applicant corporation herein and am authorized to make this verification on its behalf. I am informed and believe that the matters stated in the foregoing document are true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this **2nd day of March, 2020**, at Rosemead, California.

**Southern California Edison Company**

*/s/ William V. Walsh*

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**Appendix A**

**List of Applicable Statutes and Rules That May Impact Energy Storage Procurement**

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Subject	Reference	Key Provision
Energy Storage	Assembly Bill (AB) 2514, codified at Public Utilities Code (Pub. Util. Code) § 2835	Requires California Public Utilities Commission (CPUC) to determine targets for load-serving entity procurement of energy storage resources
Energy Storage	CPUC Rulemaking (R.)15-03-011	Rulemaking to consider policy and implementation refinements to Energy Storage Procurement Framework and Design Program
Energy Storage	CPUC Decision (D.) 13-10-040	Requires Investor-Owned Utility (IOU) procurement of energy storage pursuant to biennial CPUC-approval Plan
Energy Storage	D.14-10-045	Approves IOU procurement applications for the 2014 biennial procurement period
Energy Storage	D.16-01-032	Addresses energy storage policy and program issues that must be resolved prior to the 2016 procurement solicitations
Energy Storage	AB 1637, codified at Pub. Util. Code § 379.6. D. 17-04-017	Authorizes the CPUC to double the Self-Generation Incentive Program (SGIP) budget to encourage increased use of distributed energy resources, including energy storage
Energy Storage	AB 2861, codified at Pub. Util. Code § 769.5, D. 17-04-017	Authorizes the CPUC to create an expedited dispute resolution process for addressing interconnection issues, including energy storage
Energy Storage	AB 2868, codified at Pub. Util. Code § 2838.2 - § 2838.3	Directs IOUs to file applications to implement programs and investments to encourage up to an aggregated 500 MW of new distributed energy storage

Energy Storage	AB 33	Directs the CPUC to evaluate and analyze the potential for development of long duration bulk energy storage resources to integrate renewable energy resources.
Energy Storage	AB 546, codified at Cal. Gov't Code § 65950.8	Speeds the siting of energy storage projects by requiring cities and counties of 200,000 or more to streamline the energy storage permitting process
Energy Storage	D.16-09-004	Approves SCE's Energy Storage Agreements (A.15-12-003)
Energy Storage	D.16-09-007	Approves SCE's 2016 Energy Storage Procurement Plan
Energy Storage	D.17-04-039 Cal. Pub. Util. Code § 2836 et seq	Provides a process to implement AB 2868 by requiring IOUs to propose programs and investments for up to 500 MW of additional distributed energy storage
Energy Storage	D.18-01-003	Establishes a set of rules for promoting the multi-use applications of energy storage resources.
Energy Storage	SB 801, codified at Cal. Pub. Util. Code § 2836.7	Directs SCE to procure 20 MW of energy storage capacity to address Aliso Canyon reliability needs
Energy Storage	D.18-10-036	Approves SCE's AB 2514 energy storage procurement framework for 2018 biennial procurement period
Energy Storage	D.19-06-032	Implements SCE's AB 2868 energy storage program and approves AB 2868 application with modification
Greenhouse Gas (GHG) Emissions Performance Standard	Senate Bill (SB) 1368, codified at Pub. Util. Code § 8340 D.07-01-039	Prohibits "covered procurement" from exceeding CO2 emissions standard of 1100 lb./MWh
GHG	AB 32, codified at Health & Safety Code § 38500 et seq.	Requires California to reduce GHG emissions to 1990 levels by 2020

Renewables Portfolio Standard	SB 350, codified at Pub. Util. Code § 399.11 <i>et seq.</i>	Requires retail sellers and local publicly owned electric utilities to procure 50% of energy from renewable resources by December 31, 2030
Renewables Portfolio Standard Target	Pub. Util. Code § 399.15(b)(5)(B)(ii)	Retail sellers' efforts to develop energy storage to integrate eligible RPS resources are among the factors underlying a CPUC waiver of an RPS target
Clean Energy	Pub. Util. Code § 400	The CPUC and California Energy Commission shall, where feasible, increase the use of energy storage, among other strategies, to meet clean energy objectives
Clean Energy	AB 523, codified at Pub. Rsrc. Code § 25711.5	Directs the CPUC to direct 25% of Electric Program Investment Charge (EPIC) program funding to disadvantaged communities to advance energy storage technology, among others.
Self-Generation Incentive Plan (SGIP)	Pub. Util. Code §§ 379.5 and 379.6 D.01-03-073; D.08-11-044; D.11-09-015	Establishes SGIP to provide incentives for investing in distributed generation
SGIP	D.16-06-055	Modifies the incentives of the SGIP program by reserving 75% of the program's funds for energy storage projects with carve outs for renewable generation and residential small-scale storage
SGIP	D.17-10-004	Creates SGIP Equity Budget to provide incentives for customer sited energy storage in disadvantaged and low income communities
SGIP	Resolution E-4887	Modifies the SGIP handbook to expand the definition of an eligible developer
Permanent Load Shifting (PLS)	D.12-04-045 Resolution E-4586	Adopts PLS programs and budgets
PLS	D.17-12-003	Discontinues the PLS program effective January 1, 2018

Demand Response	D.08-04-050 D.10-12-036	Load Impacts of Demand Response and Demand Response Participation in CAISO Market
Demand Response	D.17-01-012	Approves SCE's budget for demand response programs, including energy storage
Demand Response	D.17-12-003	Authorizes an increased budget to support pilot program that increase customer participation in demand response, including energy storage projects
Resource Adequacy	D.13-06-024	Energy Storage may be procured as a form of flexible capacity used to provide resource adequacy
Resource Adequacy	R.14-10-010	Continued refinements to Resource Adequacy Program and establish flexible capacity requirements
Resource Adequacy	D.15-06-063	Decision refining Resource Adequacy Program adopting modification to flexible RA rules for storage
Resource Adequacy	D.16-06-045	Clarifies the rules for energy storage to qualify for resource adequacy
Resource Adequacy	R.17-09-020	OIR to address 2019-2020 resource adequacy programs, with a focus on local and flexible capacity requirements
Resource Adequacy	D.18-06-030	Decision providing that combined storage and DR projects are eligible to participate in the RA program
Resource Adequacy	D.19-06-026	Revised methodology of capturing interaction effect between solar and storage
Resource Adequacy	D.20-01-004	Adopts interim QC methodology for hybrid resources
Alternative-Fueled Vehicle Programs	R.13-11-007	Evaluation of electric vehicle batteries for energy storage
Integrated Resource Plan	SB 350, codified at Pub. Util. Code §§ 454.51-454.52 R.16-02-007	Directs each IOU to develop an integrated resource plan addressing, among other things, the role of energy storage in meeting peak demand

Integrated Resource Planning	D.18-02-018	Sets requirements for IOUs filing integrated resource plans
Integrated Resource Planning	D.19-11-016	Requires electric system reliability procurement for 2021-2023
Long-Term Procurement for Local Capacity Requirements	D.14-03-004	Authorizes procurement of preferred resources and energy storage
Distribution Resource Planning and Sourcing using Distributed Energy Resources (DERs)	Pub. Util. Code § 769(g); R. 14-08-013 (DRP); 14-10-003 (IDER)	Proceedings in process to develop plan and pilot programs for DER integration and to develop potential sourcing mechanisms for DER grid services
DER	D.16-12-036	Develops the Competitive Solicitation Framework and Utility Regulatory Incentive Pilot
DER	D.17-02-007	Approves two of SCE's Distributed Energy Resource demonstration projects.
DER	D.17-09-026	Approves SCE's demonstration projects and directs SCE to use an Integration Capacity Analysis to assist with distribution planning and interconnection streamlining
DER	D.19-05-019	Adopts cost-effectiveness analysis framework policies for all DERs
Distribution Resource Planning ("DRP")	AB 327, codified at Pub. Util. Code § 769	Directs IOUs to integrate DRP into distribution planning and investment and identify optimal locations for the deployment of distributed resources.
DRP	D.17-06-012	Approves SCE's final Distributed Energy Resource demonstration project, building a microgrid in Mono county.
DRP	D.18-02-004	Directs IOUs to solicit distribution deferral projects.
DRP	D.18-03-023	Provides framework for Grid Modernization Guidance to inform future GRCs
Local Capacity Requirement Application for Approval of	D.15-11-041	Decision approving Energy Storage contracts resulting from SCE's LCR RFO

Contracts in the Western LA Basin		
Local Generation Charge (“LGC”)	D.13-03-029	Authorized SDG&E to establish an LGC rate component which is designed to recover new generation costs for local reliability that are deemed to be subject to Cost Allocation Mechanism (CAM) policy
Procurement Rules	D.07-12-052	Long Term Procurement (LTPP) decision containing rules on utility-owned generation; referenced in D.13-10-040
Procurement Rules	D.16-01-032	Addresses procurement best practices, approves utilities' request for flexibility in meeting energy storage targets between grid domains, and allows utilities to satisfy transmission and distribution targets through customer projects
Transmission Interconnection Rules	California Independent System Operator Corporation (“CAISO”) Large Generator Interconnection Agreement	Requirements for generator interconnection to grid at transmission level
Distribution Interconnection Rules	Wholesale Distribution Access Tariff	Requirements for generator interconnection with IOU-owned distribution system
Distribution Interconnection Rules	Rule 21	Interconnection at distribution level by Qualifying Facilities (“QFs”) under Public Utility Regulatory Policies Act of 1978 (“PURPA”), net metering, and SGIP
Net Energy Metering (NEM)	D.14-05-033	Customer-sited systems interconnecting with storage are treated the same as systems interconnecting without storage
NEM	D.16-01-044	The “storage mandate charge” is collected through the PCIA and should not be part of the non-bypassable charge in the NEM successor tariff
NEM	D.17-12-005	Decision facilitating virtual net energy metering generation paired with a storage system

Microgrids	R.19-09-009	OIR to craft a policy framework surrounding the commercialization of microgrids
Confidentiality	Pub. Util. Code § 454.5(g); D.06-06-066, D.08-04-023, D.11-07-028	Confidentiality of energy procurement information submitted to CPUC
Confidentiality	CPUC General Order 66-D	Rules for supporting the confidentiality of information submitted to the CPUC
Cost Recovery	D.04-12-048	10-year limit on recovery of procurement costs
Cost Recovery	D.06-07-029	CAM for long-term procurement of new generation
Cost Recovery	D.08-09-012	Responsibility for non-bypassable charges
CAM	D.11-05-005	Modifies new generation and long-term contract CAM
Cost Recovery	Pub. Util. Code § 454.51(c)	Net costs of resources used to integrate renewable energy resources are allocated on a fully nonbypassable basis consistent with CAM
Standards of Conduct	D.02-10-062, as modified by D.02-12-074; D.03-06-067; D.03-06-076.	CPUC Standards of Conduct for energy procurement

**Appendix B**

**SCE's Statement of Income and Balance Sheet**

SOUTHERN CALIFORNIA EDISON COMPANY

**(h) A balance sheet as of the latest available date, together with an income statement covering the period from close of last year for which an annual report has been filed with the Commission to the date of the balance sheet attached to the application.**

STATEMENT OF INCOME  
NINE MONTHS ENDED SEPTEMBER 30, 2019

(In millions)

OPERATING REVENUE	<u>\$ 9,348</u>
OPERATING EXPENSES:	
Purchase power and fuel	3,848
Other operation and maintenance	2,259
Depreciation, decommissioning and amortization	1,259
Property and other taxes	300
Impairment and other charges	166
Other operating income	(4)
Total operating expenses	<u>7,828</u>
OPERATING INCOME	1,520
Interest expense	(549)
Other income and (expense)	152
INCOME BEFORE INCOME TAX	<u>1,123</u>
Income tax benefit	(183)
NET INCOME	<u>1,306</u>
Less: Preferred and preference stock dividend requirements	<u>91</u>
NET INCOME AVAILABLE FOR COMMON STOCK	<u><u>\$ 1,215</u></u>

SOUTHERN CALIFORNIA EDISON COMPANY

BALANCE SHEET  
SEPTEMBER 30, 2019  
ASSETS  
(in millions)

UTILITY PLANT:

Utility plant, at original cost	\$ 48,637
Less- accumulated provision for depreciation and decommissioning	<u>9,872</u>
	38,765
Construction work in progress	4,260
Nuclear fuel, at amortized cost	<u>125</u>
	<u>43,150</u>

OTHER PROPERTY AND INVESTMENTS:

Nonutility property - less accumulated depreciation of \$77	81
Nuclear decommissioning trusts	4,479
Special Funds and Other investments	<u>74</u>
	<u>4,634</u>

CURRENT ASSETS:

Cash and equivalents	86
Receivables, less allowances of \$51 for uncollectible accounts	1,087
Accrued unbilled revenue	638
Inventory	348
Income tax receivables	131
Prepaid expenses	292
Derivative assets	49
Regulatory assets	1,120
Wildfire insurance fund contributions	323
Other current assets	<u>105</u>
	<u>4,179</u>

DEFERRED CHARGES:

Regulatory assets	5,731
Wildfire insurance fund contributions	2,849
Operating lease right-of-use assets	701
Long-term insurance receivable due from affiliate	1,000
Other long-term assets	<u>1,378</u>
	<u>11,659</u>

SOUTHERN CALIFORNIA EDISON COMPANY

BALANCE SHEET  
SEPTEMBER 30, 2019  
CAPITALIZATION AND LIABILITIES  
(in millions)

CAPITALIZATION:

Common stock	\$	2,168
Additional paid-in capital		3,737
Accumulated other comprehensive loss		(25)
Retained earnings		9,520
Common shareholder's equity		<u>15,400</u>
Preferred and preference stock		2,245
Long-term debt		<u>15,129</u>
Total capitalization		<u>32,774</u>

CURRENT LIABILITIES:

Short-term debt		-
Current portion of long-term debt		79
Accounts payable		1,663
Customer deposits		302
Regulatory liabilities		1,010
Current portion of operating lease liabilities		90
Other current liabilities		1,182
		<u>4,326</u>

DEFERRED CREDITS:

Deferred income taxes and credits		6,360
Pensions and benefits		434
Asset retirement obligations		3,030
Regulatory liabilities		8,544
Operating lease liabilities		611
Wildfire-related claims		4,669
Other deferred credits and other long-term liabilities		2,874
		<u>26,522</u>

**Appendix C**

**SCE's Summary of Earnings (2018-2020)**

Southern California Edison Summary of Earnings 2018 GRC Adopted Revenue Requirement Thousands of Dollars		
Line No.	Item	Total
1.	<b>Base Revenues</b>	5,115,860
2.	<b>Expenses:</b>	
3.	Operation & Maintenance	1,732,986
4.	Depreciation	1,579,362
5.	Taxes	296,269
6.	Revenue Credits	(151,220)
7.	Total Expenses	3,457,396
8.	<b>Net Operating Revenue</b>	1,658,464
9.	<b>Rate Base</b>	22,321,623
10.	<b>Rate of Return</b>	7.43%

Southern California Edison Summary of Earnings 2019 GRC Adopted Revenue Requirement Thousands of Dollars		
Line No.	Item	Total
1.	<b>Base Revenues</b>	5,450,965
2.	<b>Expenses:</b>	
3.	Operation & Maintenance	1,782,074
4.	Depreciation	1,656,845
5.	Taxes	366,005
6.	Revenue Credits	(155,758)
7.	Total Expenses	3,649,166
8.	<b>Net Operating Revenue</b>	1,801,799
9.	<b>Rate Base</b>	24,205,329
10.	<b>Rate of Return</b>	7.44%

Southern California Edison Summary of Earnings 2020 GRC Adopted Revenue Requirement Thousands of Dollars		
Line No.	Item	Total
1.	<b>Base Revenues</b>	5,860,081
2.	<b>Expenses:</b>	
3.	Operation & Maintenance	1,832,133
4.	Depreciation	1,760,137
5.	Taxes	478,767
6.	Revenue Credits	(158,663)
7.	Total Expenses	3,912,375
8.	<b>Net Operating Revenue</b>	1,947,707
9.	<b>Rate Base</b>	26,122,849
10.	<b>Rate of Return</b>	7.46%

**Appendix D**

**List of Cities and Counties in Which the Proposed Increase Is to be Made Effective**

# INCORPORATED CITIES AND COUNTIES SERVED BY SCE

## COUNTIES

Fresno	Kern	Madera	Riverside	Tuolumne
Imperial	Kings	Mono	San Bernardino	Tulare
Inyo	Los Angeles	Orange	Santa Barbara	Ventura

## CITIES

Adelanto	Commerce	Hesperia	Lynwood	Porterville	Tehachapi
Agoura Hills	Compton	Hidden Hills	Malibu	Rancho Cucamonga	Temecula
Alhambra	Corona	Highland	Mammoth Lakes	Rancho Mirage	Temple City
Aliso Viejo	Costa Mesa	Huntington Beach	Manhattan Beach	Rancho Palos Verdes	Thousand Oaks
Apple Valley	Covina	Huntington Park	Maywood	Rancho Santa Margarita	Torrance
Arcadia	Cudahy	Indian Wells	McFarland	Redlands	Tulare
Artesia	Culver City	Industry	Menifee	Redondo Beach	Tustin
Avalon	Cypress	Inglewood	Mission Viejo	Rialto	Twentynine Palms
Baldwin Park	Delano	Irvine	Monrovia	Ridgecrest	Upland
Barstow	Desert Hot Springs	Irwindale	Montclair	Rolling Hills	Ventura
Beaumont	Diamond Bar	Jurupa Valley	Montebello	Rolling Hills Estates	Victorville
Bell	Downey	La Canada Flintridge	Monterey Park	Rosemead	Villa Park
Bell Gardens	Duarte	La Habra	Moorpark	San Bernardino	Visalia
Bellflower	Eastvale	La Habra Heights	Moreno Valley	San Dimas	Walnut
Beverly Hills	El Monte	La Mirada	Murrieta	San Fernando	West Covina
Bishop	El Segundo	La Palma	Newport Beach	San Gabriel	West Hollywood
Blythe	Exeter	La Puente	Norco	San Jacinto	Westlake Village
Bradbury	Farmersville	La Verne	Norwalk	San Marino	Westminster
Brea	Fillmore	Laguna Beach	Ojai	Santa Ana	Whittier
Buena Park	Fontana	Laguna Hills	Ontario	Santa Barbara	Wildomar
Calabasas	Fountain Valley	Laguna Niguel	Orange	Santa Clarita	Woodlake (Three Rivers)
California City	Fullerton	Laguna Woods	Oxnard	Santa Fe Springs	Ventura
Calimesa	Garden Grove	Lake Elsinore	Palm Desert	Santa Monica	Yorba Linda
Camarillo	Gardena	Lake Forest	Palm Springs	Santa Paula	Yucaipa
Canyon Lake	Glendora	Lakewood	Palmdale	Seal Beach	Yucca Valley
Carpinteria	Goleta	Lancaster	Palos Verdes Estates	Sierra Madre	
Carson	Grand Terrace	Lawndale	Paramount	Signal Hill	
Cathedral City	Hanford	Lindsay	Perris	Simi Valley	
Cerritos	Hawaiian Gardens	Loma Linda	Pico Rivera	South El Monte	
Chino	Hawthorne	Lomita	Placentia	South Gate	
Chino Hills	Hemet	Long Beach	Pomona	South Pasadena	
Claremont	Hermosa Beach	Los Alamitos	Port Hueneme	Stanton	